

1 E. MARTIN ESTRADA
2 United States Attorney
3 DAVID M. HARRIS
4 Assistant United States Attorney
5 Chief, Civil Division
6 JOANNE S. OSINOFF
7 Assistant United States Attorney
8 Chief, Complex and Defensive Litigation Section
9 JASMIN YANG (Cal. Bar No. 255254)
10 YUJIN CHUN (Cal. Bar No. 306298)
11 Assistant United States Attorney
12 Federal Building, Suite 7516
13 300 North Los Angeles Street
14 Los Angeles, California 90012
15 Telephone: (213) 894-8827 (Yang) -0929 (Chun)
16 Facsimile: (213) 894-7819
17 E-mail: jasmin.yang@usdoj.gov
18 yujin.chun@usdoj.gov

19 Attorneys for Kathryn Bailey Dress, Brent James,
20 Walter Dix, Ryan Heaton, and Lesley Buchan

21
22 UNITED STATES DISTRICT COURT
23
24 FOR THE CENTRAL DISTRICT OF CALIFORNIA
25
26 WESTERN DIVISION

27 JENI PEARSONS, et al.,

28 No. 2:23-cv-07952-RGK-MAR

Plaintiffs,

**STIPULATION TO EXTEND TIME TO
RESPOND TO INITIAL COMPLAINT
BY NOT MORE THAN 30 DAYS (L.R.
8-3)**

v.

27 UNITED STATES OF AMERICA, et
28 al.,

Complaint Served: December 22, 2023
Current Response Date: February 20, 2024
New Response Date: March 21, 2024

Defendants.

27 Honorable R. Gary Klausner
28 United States District Judge

25 Counsel for plaintiffs Jeni Pearson and Michael Storc (“Plaintiffs”) and
26 defendants Kathryn Bailey Dress, Brent James, Walter Dix, Ryan Heaton, and Lesley
27 Buchan (hereinafter collectively referred to as the “Additional Individual Defendants”)
28 hereby enter into the following stipulation to extend the Additional Individual

1 Defendants' deadline to respond to the First Amended Complaint. The stipulation is
2 based on the following:

3 1. Plaintiffs served their First Amended Complaint on the Additional
4 Individual Defendants on December 22, 2023.

5 2. The Additional Individual Defendants' deadline to respond to the
6 Complaint is February 20, 2024.

7 3. The parties hereby stipulate that the Additional Individual Defendants shall
8 have an additional thirty (30) days from February 20, 2024 through and including March
9 21, 2024, to respond to the First Amended Complaint.

10 Dated: February 16, 2024 Respectfully submitted,

11 INSTITUTE FOR JUSTICE
12 Joseph Gay*
12 Robert Frommer*
13 Robert E. Johnson*

14 THE VORA LAW FIRM, P.C.
15 Lou Egerton-Wiley
15 Nilay U. Vora
16 Jeffrey Atteberry

17 */s/ Joseph Gay* _____
17 JOSEPH GAY
18 Counsel for Plaintiffs
18 * Admitted *pro hac vice*

19 Dated: February 16, 2024 E. MARTIN ESTRADA

20 United States Attorney
20 DAVID M. HARRIS
21 Assistant United States Attorney
21 Chief, Civil Division
22 JOANNE S. OSINOFF
22 Assistant United States Attorney
23 Chief, Complex and Defensive Litigation Section

24 */s/ Jasmin Yang* _____
24 JASMIN YANG
25 Assistant United States Attorney

26 Attorneys for Kathryn Bailey Dress, Brent James,
27 Walter Dix, Ryan Heaton, and Lesley Buchan

1 ATTESTATION UNDER LOCAL RULE 5-4.3.4
2

3 I, Jasmin Yang, am the ECF User whose ID and password are being used to file
4 this **STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL**
COMPLAINT BY NOT MORE THAN 30 DAYS (L.R. 8-3). In compliance with
5 Local Rule 5-4.3.4(a)(2), I hereby certify and attest that Plaintiffs' counsel, Joseph Gay,
6 has concurred in this filing.

7 DATED: February 16, 2024 */s/ Jasmin Yang*
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1 JASMIN YANG
2 Assistant United States Attorney